

1 Honorable Tana Lin, United States District Judge  
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7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

9 JEFFERY S. MARTIN,

10 Plaintiff,

11 v.

12 PIERCE COUNTY, a Washington political  
13 subdivision; PIERCE COUNTY DOE CORRECTION  
14 OFFICERS 1-10, in their individual and official  
15 capacities; NAPHCARE, INC., an Alabama  
16 corporation doing business in the State of Washington;  
17 MIGUEL BALDERRAMA, M.D., in his official and  
18 individual capacity; JANEL FRENCH LPN, in her  
19 official and individual capacity; IRINA HUGHES, in  
her official and individual capacity; and NAPHCARE  
DOE EMPLOYEES 1-10, in their individual and  
official capacities;

Defendants.

NO. 3:20-cv-05709-TL

MOTION AND AGREED  
STIPULATION TO EXTEND CASE  
SCHEDULE DATES

NOTED DATE FOR  
CONSIDERATION:  
DECEMBER 28, 2022

20 I. RELIEF REQUESTED

21 COMES NOW Plaintiff Jeffery S. Martin, and Defendants Pierce County and NaphCare  
22 Inc., by and through their attorneys, and hereby stipulate and agree—pursuant to LCR 16(b)(6)  
23 and LCR 37(a)(1)—that depositions of witnesses identified and requested before the discovery  
24 cutoff of January 6, 2023, may be conducted after up until February 3, 2023.  
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## II. FACTS

The parties, through their undersigned counsel of record, respectfully submit this stipulated motion seeking modification of the case schedule. Additional time is needed to conduct witness depositions due to witness scheduling issues. The parties are cooperating in scheduling depositions, but the process is still ongoing. This agreement may also assist in narrowing issues by agreement or motion and may potentially assist in resolution of the case.

### III. CONCLUSION

For the forgoing reasons, the parties jointly ask this Court to grant their motion.

DATED this 28<sup>th</sup> day of December, 2022.

## BOYLE MARTIN THOENY, PLLC

/s Bardi D. Martin  

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2 Janel French, LPN, and Irina Hughes  
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5 MARY E. ROBNETT  
6 Prosecuting Attorney  
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9 /s Kerri Jorgensen per email authorization  
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19 Pursuant to the Parties' stipulation above, it is SO ORDERED.  
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21 Dated this 4th day of January 2023.



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Tana Lin  
United States District Judge